JOINT STIPULATION TO MODIFY THE PROTECTIVE ORDER

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Pursuant to the Court's Order at ECF No. 412, the Parties seek to modify the Protective Orders, (ECF Nos. 51, 166), solely to allow Defendants to transmit Plaintiffs' deposition transcripts to law enforcement subject to the following conditions:

- 1. Defendants must copy Plaintiffs' counsel on correspondence to law enforcement transmitting the transcripts;
- 2. Defendants must transmit true and correct copies of all six Plaintiffs' deposition transcripts in their entirety, rather than select transcripts or excerpts.

IT IS SO ORDERED.			
DATED:			

1	Date: October 25, 2024	
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3	Respectfully Submitted,	
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